

FILED CLERK, U.S. DISTRICT COURT 1/20/23 CENTRAL DISTRICT OF CALIFORNIA BY: <u> slo </u> DEPUTY
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Elizabeth Thomas
20827 Norwalk Blvd #39
Lakewood, CA 90715
Phone: 562-541-3665
Email: 11747carson@gmail.com
Alt Email: lakewoodcarsonstreet@gmail.com

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT COURT OF CALIFORNIA

ELIZBETH THOMAS,
Plaintiff,

vs.

BV LAKEWOOD CARSON SE LLC, LOS
ANGELES COUNTY SHERIFF'S
DEPARTMENT
Defendant

Case No.: 2:22-CV-07989-SPG-JEM

AMENDED COMPLAINT

JURISDICTION

The court must have federal subject jurisdiction as well as personal jurisdiction to hear my case according to the public counsel law center guide prepared by public counsel. The defendant is not a resident or citizen of California. I am suing the defendant for something they did in California. The defendant has consented to being sued in CA. He registered to do business in California. The defendant's actions have put him at risk of being sued in California. My complaint involves a federal law. See Exhibit A. For federal question jurisdiction, 28 U.S.C. 1331 Federal Law 28 U.S.C. 1331, section 1

There is diversity jurisdiction 28 U.S.C. 1332 The defendant is an entity formed in Colorado. Principal address is in Colorado and there is no California street address for office. Please see exhibit 2 for diversity jurisdiction

VENUE

The venue is correct because Los Angeles is a county in the Central District of California. A substantial part of the events that I am suing for happened in this district. A substantial part of the property I am suing over is located in this district. I live in this district. Please see

AMENDED COMPLAINT

1 Exhibit C for Venue.

2 PARTIES

3 The plaintiff is an individual who lives and does
4 business in the state of California. She is the
5 property owner of Worktough Inc, also known as
6 Moreno LLC. The defendant has sued her in superior
7 court for UNLAWFUL DETAINER. She was wrongfully
8 illegally removed from her home and office. She was
9 sued as a trespasser. At the time she had a quiet
10 lawsuit for quiet title, based off of adverse
11 possession filed in the federal court and the
12 superior court. The defendant is BV LAKEWOOD CARSON
13 SE LLC, registered agent for process would be
14 Registered agents solutions, inc, mailing address
15 6400 S.FIDDLERS GREEN CIRCLE, SUITE 1820 GREENWOOD
16 VILLAGE , CO 80111
17 WILLIAM ROTHACKER

18 see Exhibit B for defendant information.

19 Defendant #2 is Los Angeles County Sheriff
20 Department. The address to their location is 5130
21 Clark Avenue, Lakewood, CA 90712
22 process address is 211 W. Temple St, Los Angeles, CA
23 90012. They are apart of the county governemnt.

24 FACTS

25 July 11, 2022, the plaintiff was forced out of her
26 home and office. The defendants have been

27 AMENDED COMPLAINT
28

1 harrassing her and following her. They impounded
2 hermercedes benz and chevy tahoe. There were people
3 on the property and the plainitff approached them
4 and asked them to not touch her stuff. They spit in
5 her face and made threats that scared her. She
6 drove away crying and she called the sheriffs to
7 make a report. The sheriffs called her and told her
8 that if she filed a report about the man spitting
9 in her face that she would go to jail. She has been
10 to jail 3 times for going back to her property and
11 there is no record to show of those arrest
12 happening except for a receipt from the sheriff
13 station property receipt. see Exhibit D for arrest
14 records. Defendant claims my vehicles were towed
15 after i went back to the property in September but
16 clearly kennys tow received the vehicles the day
17 after I was threatened off the ~~property was removed~~
18 Exhibit E shows when kennys tow came into
19 possession of the vehicles.
20

21 see Exhibit E-F

22 Exhibit F-shows paid. The opposing party sent my
23 colleague Bruce Kolacki \$1300 to his bank account to
24 get the tahoe out of the impound under the
25 conditions of removing my things from the property
26 as soon as i receive the vehicle. I received the
27 truck but did not remove my things that is why he

28 AMENDED COMPLAINT

1 did not send the money for the Mercedes to get
2 released because I did not follow through with his
3 plan. He tried to use my vehicles as leverage to
4 get me to abandon my building and property.

5 I have been harrassed since then. I sent all my
6 evidence to the judge on file and then the day of
7 trial my judge was switched to someone else. The
8 CRD in the courtroom said we dont usually hear
9 cases like yours but today we will make an
10 exception. A few days ago I was followed from the
11 property by a sheriff with his sirens on. He
12 followed me all the way inside the gate that I had
13 to open and then he backed out. I called the
14 station and asked if i could speak to the watch
15 commander and Luitenant Madonando said he did not
16 have any deputies dispatched to that location nor
17 did he see any record of any deputies sent out to
18 the location i was followed to.

19
20 I ask the watch commander to tell his deputies to
21 leave me and my husband alone. Today is January
22 20,2023, I just got out of the hospital. I was in
23 intensive care unit for a day and then they
24 transferred me down stairs for 2 days. I almost
25 died the day the deputy had followed me with his
26 sirens on. I fear for my life.

27 REQUEST FOR RELIEF

28 AMENDED COMPLAINT

1
2 Plaintiff requests the court grant her a order for
3 protective order against the defendants.

4 Plaintiff requests this order state that the
5 defendants pay her for the hardship she has endured
6 while litigation has been pending.

7 to pay a total of \$10,000. For not complying to a
8 court ordered subpoena and for harrassment.

9 Any further relief the court may find appropriate.

10 DEMAND FOR A JURY TRIAL

11 Plaintiff hereby request a jury trial on
12 all issues raised in this complaint.

13
14 DATED: January 20, 2023

15 signed : *Elizabeth Thomas*

16 Printed: *Elizabeth H. Thomas*

17 Elizabeth Thomas

18 Plaintiff
19
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28 AMENDED COMPLAINT

NATIONAL CONSTITUTION CENTER



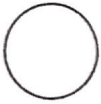
EXHIBIT ~~A~~ FEDERAL Question Jurisdiction
28 U.S.C. § 1331
14TH AMENDMENT

Federal Law

Citizenship Rights, Equal Protection, Apportionment, Civil War Debt

Signing Details

More in The Constitution



Share

Section 1

All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or

Section 2

Representatives shall be apportioned among the several States according to their respective numbers, counting the whole number of persons in each State, excluding Indians not taxed. But when the right to vote at any election for the choice of electors for President and Vice-President of the United States, Representatives in Congress, the Executive and Judicial officers of a State, or the members of the Legislature thereof, is denied to any of the male inhabitants of such State, being twenty-one years of age, and citizens of the United States, or in any way abridged, except for participation in rebellion, or other crime, the basis of representation therein shall be reduced in the proportion which the number of such male citizens shall bear to the whole number of male citizens twenty-one years of age in such State.

Section 3

No person shall be a Senator or Representative in Congress, or elector of President and Vice-President, or hold any office, civil or military, under the United States, or under any State, who, having previously taken an oath, as a member of Congress, or as an officer of the United States, or as a member of any State legislature, or as an executive or judicial officer of any State, to support the Constitution of the United States, shall have engaged in insurrection or rebellion against the same, or given aid or comfort to the enemies thereof. But Congress may by a vote of two-thirds of each House, remove such disability.



STATE OF CALIFORNIA
Office of the Secretary of State
STATEMENT OF INFORMATION
LIMITED LIABILITY COMPANY
 California Secretary of State
 1500 11th Street
 Sacramento, California 95814
 (916) 653-3516

For Office Use Only

-FILED-

File No.: BA20220797281

Date Filed: 9/2/2022

EXHIBIT B Diversity Jurisdiction 28 U.S.C. §1332

Entity Details

Limited Liability Company Name

BV LAKEWOOD CARSON SE LLC

Entity No.

202033510647

Formed In

COLORADO

Street Address of Principal Office of LLC

Principal Address

6400 S FIDDLERS GREEN CIRCLE, SUITE 1820
GREENWOOD VILLAGE, CO 80111

Mailing Address of LLC

Mailing Address

6400 S FIDDLERS GREEN CIRCLE, SUITE 1820
GREENWOOD VILLAGE, CO 80111

Attention

Street Address of California Office of LLC

Street Address of California Office

None

Manager(s) or Member(s)

Manager or Member Name

Manager or Member Address

WILLIAM R ROTHACKER

6400 S FIDDLERS GREEN CIRCLE, SUITE 1820
GREENWOOD VILLAGE, CO 80111

Agent for Service of Process

California Registered Corporate Agent (1505)

REGISTERED AGENT SOLUTIONS, INC.
Registered Corporate 1505 Agent

Type of Business

Type of Business

REAL ESTATE

Email Notifications

Opt-in Email Notifications

No, I do NOT want to receive entity notifications via email. I
prefer notifications by USPS mail.

Chief Executive Officer (CEO)

CEO Name

CEO Address

None Entered

Labor Judgment

No Manager or Member of this Limited Liability Company has an outstanding final judgment issued by the Division of Labor Standards Enforcement or a court of law, for which no appeal therefrom is pending, for the violation of any wage order or provision of the Labor Code.

Electronic Signature

☒ By signing, I affirm under penalty of perjury that the information herein is true and correct and that I am authorized by California law to sign.

TROY ALLEN, AUTHORIZED FILER

09/02/2022

Signature

Date

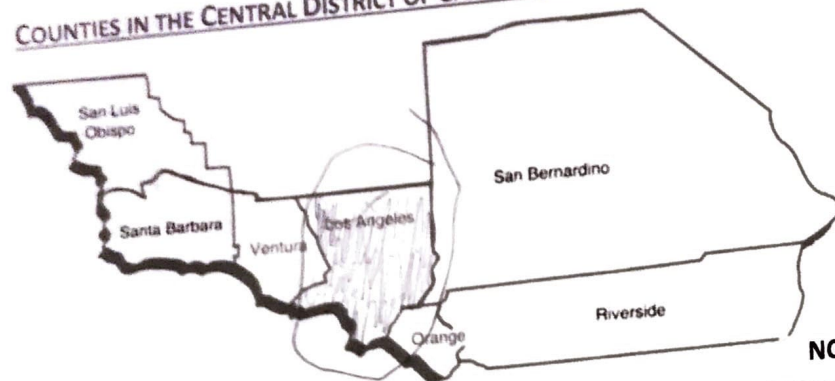
B1072-9377 09/02/2022 2:49 PM Received by California Secretary of State

EXHIBIT C - Venue



Venue: Am I Suing in the Right Location?

COUNTIES IN THE CENTRAL DISTRICT OF CALIFORNIA



- Los Angeles County
- Orange County
- Riverside County
- San Bernardino County

- San Luis Obispo County
- Santa Barbara County
- Ventura County

START HERE

Did a substantial part of the events you are suing about happen in this district?

YES

NO

Is a substantial part of the property you are suing over located in this district?

YES

NO

Do all of the defendants live in California?

YES

NO

Does at least one of the defendants you are suing live in this district?

YES

NO

Are you suing the U.S. government or a federal official or agency in their official capacity?

NO

YES

Do you live in this district?

YES

NO

If this court has subject matter jurisdiction AND personal jurisdiction, you are **probably** in the

Correct Venue

You are **probably** in the

Wrong Venue

6

This chart is designed to give you a basic idea of how venue works.


Please carefully research venue rules, visit the Federal Pro Se Clinic, or, if possible, consult an attorney.

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**LOS ANGELES COUNTY JAIL
BOOKING AND PROPERTY
RECORD**

DATE OF BIRTH	YES	NO
NAT. NAT.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
HAVE AIDS	<input type="checkbox"/>	<input checked="" type="checkbox"/>
HAVE VD	<input type="checkbox"/>	<input checked="" type="checkbox"/>
HAVE HEPATITIS	<input type="checkbox"/>	<input checked="" type="checkbox"/>
HAVE TB	<input type="checkbox"/>	<input checked="" type="checkbox"/>
EVER HAVE TB	<input type="checkbox"/>	<input checked="" type="checkbox"/>

EXHIBIT D

BOOKING NO. 6455511	LOC. BKG LKD	DR. LIC. NO. E104159	STATE CA
ARRESTEE'S NAME LAST THOMAS			
FIRST ELIZABETH			
MIDDLE MARIA			
			
AGY. OR DETAIL ARRESTING 1301	DATE & TIME ARRESTED 09-01-2022 0300		TIME BKD.
LOCATION OF ARREST 11747 CARSON STREET, LAKEWOOD		TOTAL BAIL 5000	
CHARGE 419PC / M / RETAKE LAND AFTER LEGAL REMOVAL		WARR/COMM. NO. N/A	
JAIL LOC. LKD	ARRAIGN DATE 09-02-2022	TIME 0830	COURT BELLFLOWER

PRISONER'S RECORDS

PRISONERS SIGNATURE WHEN BOOKED

X

LOCATION OR DISPOSITION OF VEHICLE
LEFT AT LOCATION

PRISONERS SIGNATURE WHEN BOOKED

X

PRISONERS SIG. FOR RECT OF REMAINING CASH & PROPERTY

X

Bulk Property: ☒ None ☐ Yes

Pink - Prisoner's Copy

NOTICE OF PENDING LIEN SALE FOR VEHICLE VALUED \$4000 OR LESS
(Civil Code Sect. 3072)www.ezLien
2022-01921

Exhibit E

TO WHOM IT MAY CONCERN:

This is to notify you that I intend to sell this vehicle at a Lien Sale (public sale) because my towing, storage or repair bill has not been paid. You may wish to take one of the following actions:

1. Pay my bill and reclaim the vehicle before the sale date.
2. Stop the Sale and dispute the lien in court. You may stop the sale by completing the Declaration of Opposition below and forwarding this notice to the DMV in the enclosed envelope within 10 days of the date this notice was mailed.
3. Disregard this notice if you no longer own or want this vehicle so I can proceed with the sale. However, if you are the last owner of record, you may be liable for removal and disposition costs and lien not satisfied by sale of the vehicle.

VEHICLE DESCRIPTION	LICENSE NUMBER	STATE REGISTERED	LICENSE EXPIRATION DATE	VEHICLE IDENTIFICATION NUMBER (VIN)
	4VKJ644	CA	10/24/22	WDBJF65J32B421904
INFORMATION ABOUT MY LIEN	MAKE	YEAR	MODEL	BODY TYPE
	MERCEDES-B	2002	E320	4D
INFORMATION ABOUT THE SALE	DATE VEHICLE CAME INTO MY POSSESSION	DATE OWNER BILLED FOR SERVICES/STORAGE	DATE WORK OR SERVICES COMPLETED	MY TOWING AND STORAGE WAS AUTHORIZED BY A PUBLIC AGENCY
	07/12/22	07/21/22		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
CERTIFICATION	The amount and basis for my lien and outstanding parking violation bill is:			
	STORAGE TO DATE	AT THE RATE OF	TOWING	REPAIRS
DECLARATION OF OPPOSITION	\$600.00	\$60.00 PER DAY	\$225.00	\$
	PRK VIOLATIONS-CVC 22851.1 COST TO CONDUCT LIEN SALE \$70.00			
DECLARATION OF OPPOSITION	This vehicle will be available for inspection at least one hour prior to the sale.			
	DATE NOTICE OF SALE MAILED	DATE OF SALE	HOUR OF SALE	
DECLARATION OF OPPOSITION	07/21/22	08/22/22	10:00 AM	
	LOCATION OF SALE (STREET ADDRESS) CITY STATE ZIP CODE			
DECLARATION OF OPPOSITION	17406 WOODRUFF AVE BELLFLOWER CA 90706			
	I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct and I have no information or belief that there is a valid defense to the claim which gives rise to the lien. I further certify (or declare) under penalty of perjury that the lien sale was conducted in accordance with the requirements of California Military and Veterans Code Sec. 407, 408, 409.1 and 409.3 and with the requirements of Sections 3952, 3953 and 3958 of Title 50 of the United States Code.			
DECLARATION OF OPPOSITION	DATE	SIGNATURE OF LIENHOLDER OR AGENT ACTING FOR LIENHOLDER		
	07/20/22	X KENNYS AUTO SERVICE by		
DECLARATION OF OPPOSITION	LIENHOLDER (NAME)	TELEPHONE NO.	BUREAU OF AUTOMOTIVE REPAIR #	
	KENNYS AUTO SERVICE	(562) 925-9531		
DECLARATION OF OPPOSITION	ADDRESS	CITY	STATE	ZIP CODE
	17406 WOODRUFF AVE	BELLFLOWER	CA	90706
DECLARATION OF OPPOSITION	AGENT ACTING FOR LIENHOLDER (NAME)	TELEPHONE NO.	REGISTRATION SERVICE NUMBER	
		()		
DECLARATION OF OPPOSITION	ADDRESS	CITY	STATE	ZIP CODE
DECLARATION OF OPPOSITION	TO: DEPARTMENT OF MOTOR VEHICLES			
	Please stop the lien sale of this vehicle because I wish to contest the claim of the lienholder. I understand the lienholder may file an action in court and if judgment is given in his/her favor, I may be liable for the court costs. The address at which I may be served or notified in person of any court action is:			
DECLARATION OF OPPOSITION	PRINT TRUE FULL NAME	TELEPHONE NUMBER		
		()		
DECLARATION OF OPPOSITION	ADDRESS	CITY	STATE	ZIP CODE
DECLARATION OF OPPOSITION	MAILING ADDRESS IF DIFFERENT FROM ABOVE			
DECLARATION OF OPPOSITION	I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct.			
	DATE	SIGNATURE		
DECLARATION OF OPPOSITION		X		
	ATTENTION: This Declaration of Opposition will not be valid unless you have signed, provided your true full name and a valid address. If the lienholder is unable to serve you with a court action, he/she will be allowed to continue with the lien sale (Civil Code 3072).			

NOTE TO THE LIENHOLDER:

This notice is to be sent to the registered owner, legal owner, Department of Motor Vehicles, and any other person interested in this vehicle, 31 to 41 days before the date of sale (do not count day notice mailed). Send notice certified mail, return receipt requested, or U.S. Postal Service Certificate of Mailing.

EXCEPTION: Notice to the department must be sent by certified mail, return receipt requested.

At least 10 days before the sale, a copy of this notice shall be posted in a conspicuous place on the premises of the business office of the lienholder, and if the sale occurs at a place other than the business office, a notice must be posted at the site of the forthcoming sale.

REGISTERED OWNERHUNTER NEITH ANDRINA/
KLEIMAN ROBERT A
14271 JEFFREY RD 509
IRVINE, CA 92620**LEGAL OWNER**Certified # to DMV: 7020 0090 0001 9435 2875
Department of Motor Vehicles
Lien Sale Unit
P.O. Box 932317
Sacramento, CA 94232-3170**INTERESTED PARTIES**KOLACKI BRUCE
20827 NORWALK BLVD APT 39
LAKEWOOD, CA 90715

KENNYS AUTO SERVICE
17406 WOODRUFF AVE
BELLFLOWER, CA 90706

Date In 07/11/22 Time 18:05

Control Number 2022-01910

Telephone Number (562)925-9531
 CA#

Vehicle or Vessel Released to:

ELIZABETH THOMAS
 20827 NORWALK BL
 LAKEWOOD, CA 90715-

Date Released 07/22/22 Time 20:31

Invoice Date 07/22/22

Upon request, you are entitled to receive a copy of the Towing Fees and Access Notice.

Vehicle Description				
STATE CA	LICENSE NUMBER 7KQZ079	EXPIRATION DATE 03/08/23	VEHICLE IDENTIFICATION NO. 1GNEC13T93R229843	MOTORCYCLE ENGINE NUMBER
YEAR 2003	MAKE CHEVROLET	MODEL TAHOE	ODOMETER	

Date	Actual charges applied to the vehicle described above	Amount
07/11/22	TOWING CHARGES	225.00
07/22/22	TOWING CHARGE SUBTOTAL	225.00
	12 DAYS STORAGE AT THE RATE OF \$60.00 PER DAY	720.00
	TITLE SEARCH / LIEN PROCESSING FEES	70.00
	TOTAL OF CHARGES LISTED ABOVE	\$1,015.00
	Adjustment / (Deficiency)	112.50

Invoice items	Charges	Balance
TOTAL CHARGES UP TO RELEASE	1,015.00	\$1,015.00
AFTER HR	112.50	\$1,127.50
THE TOTAL AMOUNT OF THIS INVOICE IS DUE UPON RECEIPT		\$1,127.50

I/We the undersigned hereby acknowledge receipt of the vehicle described above and state under penalty of perjury under the laws of the State of California that I/we are legally entitled to this vehicle and assume all liability for the same from this time forward.

I/We further agree to indemnify and save harmless KENNYS AUTO SERVICE, its successors, assigns or agents, from any and all claims, actions, suits, agreements or liabilities arising from its possession of the vehicle described above.

(1) Signature of responsible party

(2) Signature of responsible party

(1) Printed name

Date

(2) Printed name

Date

PAID
 Visa